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Attorneys for Defendants/Counterclaimants
HEDMARK VIII, LLC and
WESTLAND FINANCIAL III, LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

DOUGLAS KEANE,

Plaintiff,

v.

HEDMARK VIII, LLC and WESTLAND
FINANCIAL III, LLC

Defendants.

Case No. C 07-06074 EMC

**JOINT STIPULATION AND [PROPOSED]
ORDER OF DISMISSAL OF ALL CLAIMS
AND COUNTERCLAIMS WITH PREJUDICE
PURSUANT TO F.R.C.P. 41(a).**

Action Filed: October 22, 2007
Action Removed: November 30, 2007
Judge: Hon. Edward M. Chen

1 1. IT IS HEREBY STIPULATED by and between Plaintiff DOUGLAS KEANE and
2 Defendants/ Counter-plaintiffs HEDMARK VIII, LLC and WESTLAND FINANCIAL III, LLC,
3 through their counsel of record, that all claims and counterclaims in the above-captioned action
4 by or against any of the aforementioned parties are dismissed with prejudice pursuant to Federal
5 Rules of Civil Procedure Rule 41(a), each party to bear his or its own attorney's fees and costs.

6 2. The parties further stipulate that all pending dates for this matter, including all
7 matters set forth in the Court's Amended March 19, 2008 Minute Order, are vacated.

8 3. The parties further stipulate that the Court may enter an order based on this
9 stipulation.

10 4. Pursuant to General Order 45(X)(B), the filer attests that concurrence in the filing
11 of the document has been obtained from each of the other signatories.

12 Dated: May 14, 2008

FOLGER LEVIN & KAHN LLP

13 /s/

14 Joel D. Smith
15 Attorneys for Plaintiff
Douglas Keane

16 Dated: May 14, 2008

KEANE LAW FIRM

17 /s/

18 Christopher Keane
19 Attorneys for Plaintiff
Douglas Keane

20 Dated: May 14, 2008

Merrill, Arnone & Jones LLP

21 /s/

22 Ross Jones
23 Attorneys for Defendants Hedmark VIII, LLC and
24 Westland Financial III, LLC

25 **[PROPOSED ORDER]**

26 Following the stipulation of the parties, and FRCP 41(a), IT IS HEREBY ORDERED that:
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1 1. All claims against Defendants HEDMARK VIII, LLC and WESTLAND
2 FINANCIAL III, LLC, and all counterclaims against Plaintiff DOUGLAS KEANE, are hereby
3 DISMISSED WITH PREJUDICE, each party to bear his or its own attorney's fees and costs; and

4 2. All pending dates for this matter, including all matters set forth in the Court's
5 Amended March 19, 2008 Minute Order, are vacated.

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7 Dated: May 19, 2008

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Honorable Edward M. Chen
United States District Judge

